

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
v.)
KENNETH BRISSETTE and) Case No. 16-cr-10137-LTS
TIMOTHY SULLIVAN)
)

**DEFENDANT SULLIVAN'S MOTION FOR LEAVE TO FILE A MEMORANDUM OF
LAW CONTAINING 26 PAGES**

Defendant Timothy Sullivan moves the Court for leave to file a memorandum of law in excess of 20 pages in support of his motion for acquittal pursuant to Fed. R. Crim. P. 29(a). Sullivan requests to file a memorandum of law that contains 26 pages. In support thereof, Sullivan states that extra pages are needed in order to fully address the insufficiency of the government's proof where it has set forth several alternate theories of certain required elements of Hobbs Act extortion.

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)(2)

Undersigned counsel hereby certifies that the parties have conferred in an effort to narrow the issues raised by this motion.

Respectfully submitted,

TIMOTHY SULLIVAN,
By his attorneys,

/s/ *Thomas R. Kiley*
/s/ *William J. Cintolo*
/s/ *Meredith G. Fierro*

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Dated: August 3, 2019